

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

UNITED STATES OF AMERICA

§
§
§
§

VS.

CR. NO. 7:19-CR-02341

BRENDA FUENTES

§

DEFENDANT'S

"UNOPPOSED"

MOTION FOR CONTINUANCE OF
PRE-TRIAL & JURY SELECTION DATES

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES BRENDA FUENTES, defendant in the above entitled and numbered cause, by and through her attorney RUDY MORENO, and respectfully moves the Court to reset the Pre-Trial and Jury Selection dates in this cause and would show the Court as follows:

I.

This case is presently set for Pre-Trial on February 3, 2020 at 2:00 p.m., and Jury Selection on February 6, 2020, at 9:00 a.m., before this Honorable Court.

II.

Defendant's counsel is respectfully requesting a continuance of the pre-trial and jury selection dates. The undersign counsel is commencing a felony trial in the 389th District Court of Hidalgo Count on January 28, 2020 (*State of Texas vs. Leonel Adame; Docket Number: CR-0408-18-H; Charge(s): Intoxication Manslaughter w/ a Vehicle*). Trial is expected to last two (2) weeks.

Moreover, undersign counsel will need addition time (after trial is completed) to review the Government's plea offer with Defendant.

III.

AUSA Amy Lynn Greenbaum is “Unopposed” to the Court granting Defendant’s request.

IV.

This Motion is not made for purposes of delay but only so that justice may be done and to provide defendant the effective assistance of counsel.

WHEREFORE, PREMISES CONSIDERED, Defendant prays unto the Court this Motion for Continuance be granted and the present Pre-trial and Jury Selection dates be re-set as respectfully requested.

Respectfully Submitted,

/S/RUDY MORENO
RUDY MORENO
State Bar No. 24102807
Federal I.D. No. 3102324

LAW OFFICES OF RUDY MORENO
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CERTIFICATE OF SERVICE

I hereby certify that on this the 27th day of January, 2020, I filed a Motion to Continue the Pre-Trial and Trial dates with the Clerk of the Court & provided a copy of such filing to all counsel of record.

/S/RUDY MORENO
RUDY MORENO

CERTIFICATE OF CONFERENCE

I hereby certify that I have spoken with the AUSA Amy Lynn Greenbaum in reference to Defendant **BRENDA FUENTES'** Motion for Continuance.

/S/RUDY MORENO
RUDY MORENO